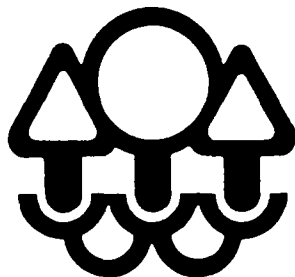




347807



## Minnesota Pollution Control Agency

September 11, 1987

Mr. Dennis Thorson  
A.F.C.  
Highway 52 S.  
Chatfield, Minnesota 55923

Dear Mr. Thorson:

RE: Hazardous Waste and F001-F005 Land Ban Inspection  
A.F.C.  
Chatfield, MND062859038, Generator

The Minnesota Pollution Control Agency (MPCA) is carrying out the provisions of the Minnesota Hazardous Waste Rules (Chapter 7045) and is cooperating with the U.S. Environmental Protection Agency (EPA) in conducting Land Ban Disposal Inspections (40 CFR Part 268). The EPA has determined that land disposal of F001-F005 solvent wastes creates severe environmental problems. Therefore, on November 8, 1986 EPA restricted the land disposal of all F001-F005 wastes. To ensure compliance with these new regulations and the State hazardous waste rules, MPCA staff are conducting inspections of companies in Minnesota that are engaged in the generation, storage, treatment, or disposal of hazardous wastes.

This letter acknowledges that A.F.C. (Company) was inspected on August 12, 1987 by Sherryl Livingston of the Solid and Hazardous Waste Division of the MPCA and Paul Dimock and Wally Nied of the EPA. Your company was represented by yourself.

During our visit we discussed both the State hazardous waste rules and the Land Disposal Restrictions for F001-F005 solvent wastes. The F001-F005 waste streams are listed under Minn. Rules pt. 7045.0135, subp. 2. The two inspections will be discussed separately in this letter.

### State Hazardous Waste Inspection

You indicated during the inspection that the Company generates 12 55-gallon drums of waste acetone and 4 55-gallon drums of waste methylene chloride a month. Based on this amount the Company is considered a hazardous waste generator under the Minnesota hazardous waste rules.

Phone: \_\_\_\_\_

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The following violations were noted and discussed during the inspection:

1. The weekly inspections of the hazardous waste storage areas must be documented in accordance with Minn. rules pt. 7045.0292, subp. 1.B.
2. All personnel that handle hazardous waste must have a review of the initial hazardous waste training on an annual basis as outlined under Minn. rules pt 7045.0558, subp. 5. New employees must have the initial training within the first six months of employment.
3. A copy of the Contingency Plan must be sent to the local fire department and police station as stated under Minn. Rules 7045.0572, subp.5.B.

F001-F005 Land Ban Inspection

During the course of the land ban inspection, the following EPA requirements were discussed:

1. Written notification to the receiving facility must accompany every shipment of F001-F005 hazardous waste. The notification must include:
  - a. EPA Hazardous Waste number;
  - b. Applicable treatment standards if the waste is to be land disposed;
  - c. The manifest number associated with the shipment of waste; and
  - d. Waste analysis, where available.
2. The generator/hazardous waste facility must have current analysis of its "F001-F005" solvent waste streams including mixtures.
3. The generator/hazardous waste facility must have copies of manifests to document the proper disposal of its "F001-F005" solvent wastes.
4. Hazardous waste facilities only. The owner/operator of the hazardous waste facility must ensure that each container/tank is clearly marked as to the content and date entered into storage for "F001-F005" solvent wastes.

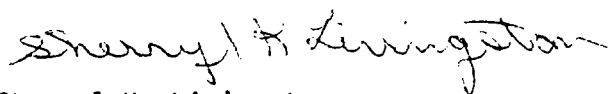
Based on the results of the Land Ban inspection, the Company is in violation of the notification requirement.

Please submit a written response within 30 days of receipt of this letter describing the steps taken to address the State hazardous waste violations and the Land Disposal Restriction violation.

Mr. Dennis Thorson  
Page Three

Thank you for taking the time to explain your company's operations to us. If you have any questions please feel free to contact me at 612/296-7270.

Sincerely,

A handwritten signature in cursive script that reads "Sherryl K. Livingston".

Sherryl K. Livingston  
Hazardous Waste Enforcement Unit  
Hazardous Waste Section  
Solid and Hazardous Waste Division

SKL:njd

cc: Paul Little, U.S. Environmental Protection Agency, Region V, Chicago